## IN THE UNITED STATES DISTRICT COURT

### FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED:
THOMAS PARK,	:	VIOLATIONS:
a/k/a "Alexander T. Park"		18 U.S.C. §1343 (wire fraud - 1 count)
	:	18 U.S.C. §922(g)(1) (possession of
		firearm by convicted felon - 1 count)

## INDICTMENT

## **COUNT ONE**

### THE GRAND JURY CHARGES THAT:

At all times relevant to this indictment:

- 1. The United States General Services Administration ("GSA") managed a fleet of government-owned vehicles and supervised the awarding of contracts for automotive repairs for these vehicles at various locations, including an office located in Forest Park, Georgia. As part of the contracting process, GSA sought competing quotations and estimates for vehicle repairs from vendors for services costing in excess of \$2,500 per vehicle.
- 2. Defendant **THOMAS PARK** operated an automotive repair business known as A-Park Auto Body and Towing ("A-Park") in Philadelphia, Pennsylvania. Defendant **THOMAS PARK** submitted estimates to GSA under the name of A-Park for repair work totaling over \$2,500 for each government-owned vehicle.

#### THE SCHEME

3. From in or around January 2001 to in or around March 2004, defendant

## THOMAS PARK, a/k/a "Alexander T. Park,"

devised and intended to devise a scheme to defraud GSA, and to obtain money and property by means of false and fraudulent pretenses, representations and promises.

#### MANNER AND MEANS

It was part of the scheme that:

- 4. Defendant **THOMAS PARK** prepared and caused to be prepared false and fictitious estimates in the name of another automotive repair business for submission to GSA, and submitted those estimates to GSA.
- 5. A-Park received approximately \$27,659.62 from GSA in payment for repairs to approximately 7 government-owned vehicles based upon its submission of bids that included false and fraudulent estimates.
- 6. On or about January 22, 2004, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

## THOMAS PARK, a/k/a "Alexander T. Park,"

for the purpose of executing the scheme described above, and aiding and abetting its execution, caused to be transmitted by means of wire communication in interstate commerce three estimates for the repair of a vehicle, tag no. G43-24072, sent by facsimile from A-Park in Philadelphia, Pennsylvania to GSA in Forest Park, Georgia.

In violation of Title 18, United States Code, Sections 1343 and 2.

## **COUNT TWO**

### THE GRAND JURY FURTHER CHARGES THAT:

On or about April 21, 2004, in Philadelphia, in the Eastern District of Pennsylvania, defendant

# THOMAS PARK, a/k/a "Alexander T. Park,"

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce firearms, that is, an Armi Tanfoglio pistol, Model GT-32, .32 caliber, S/N AC75419 and a Harrington and Richardson revolver, Model Defender 38, .38 S&W caliber, S/N 4117.

In violation of Title 18, United States Code, Section 922(g)(1).

**GRAND JURY FOREPERSON** 

A TRUE BILL:

PATRICK L. MEEHAN
UNITED STATES ATTORNEY